



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029**

September 28, 2010

Victoria Rutson  
Chief, Section of Environmental Analysis  
Surface Transportation Board  
395 E. Street, SW  
Washington, DC 20423

Attn: Danielle Gosselin  
Environmental Filing FD 35116

Re: Docket No. FD 35116, Draft Environmental Impact Statement  
R.J. Corman Railroad Company/Pennsylvania Lines Inc, CEQ #201010280

Dear Ms. Rutson:

In accordance with the National Policy Act of 1969 (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the above referenced project. The DEIS was prepared to meet the requirements of NEPA. The proposed rail line would be approximately 20 miles long, located in eastern Clearfield County, primarily in Morris and Copper Township, and in western Centre County, Rush and Snow Show Townships in Pennsylvania. The purpose of the proposed rail line is to service a speculative new quarry, landfill and industrial park currently being developed by Resource Recovery LLC. Other shippers identified along the line include the proposed Rex Energy Corporation, a facility that would use the line for the transportation of "frac water" used in the natural gas extraction process in nearby Marcellus Shale fields in Central Pennsylvania; and Robindale Energy Services which would use the line to ship coal.

The applicant, R.J. Corman Railroad Company (RJCR), analyzed the original proposed action, a modified preferred action (that is now the preferred alternative) and two options under the no build alternative. The Preferred Alternative will involve the reactivation of the rail banked Eastern segment that will result in the loss of approximately 9.3 miles of the Snow Shoe Multi-Use Rail Trail. Additionally, the Western segment of the project will require the construction and operation of 10.8 miles of an abandoned rail line between Wallacetown and Wilburn in Clearfield County, Pennsylvania. The preferred alternative will impact 3.36 acres of wetland and 980 linear feet of stream channel.

In accordance with NEPA, EPA is rating the Proposed Action as Environmental Concerns (EC), Insufficient Information (2) because of its potential impacts to irreplaceable environmental resources. For more information on our rating guidelines go to: [www.epa.gov/compliance/nepa/comments/ratings.html](http://www.epa.gov/compliance/nepa/comments/ratings.html)

The following paragraphs are for your consideration when developing the final EIS:

- The entities that will be serviced by this railroad are, to EPA's understanding, still in the early developmental stages without a realistic timeframe for completion. What is the timeframe to construct the rail line and if these projects were to fall through what will be the need for the rail line?
- Rex Energy Corporation estimates it could potentially ship and receive 250-300 carloads of water per month via the proposed rail line. Will the "frac water" be initially treated before being transported to the facility? What is the potential for growth within this facility to see more than the estimated number of cars carrying "frac water" and whereby increasing the number of trains running on the proposed line?
- Please provide additional information on the methods used to maintain the rail corridor through out the project area, specifically, the use of herbicides and pesticides. EPA is concerned that the use of these agents in the sensitive areas of the Moshannon State Forest and surrounding waterways can have detrimental environmental effects. Also include a discussion on the control of invasive species in the area and how to prevent their spreading along the rail corridor.
- If RJCR is planning to construct fencing along any sections of the corridor please provide those locations. EPA is concerned that excessive fencing may deter animal passage in the project area.
- Include information on where storage areas, access roads and construction pads will be located and any environmental impacts that may be associated with the actual construction sites along the corridor.
- The preferred alternative does have an increased amount of wetland impacts. The final EIS should address what additional minimization techniques can be used to further reduce the impacts to Waters of the U.S.
- The DEIS mentions the use of an in lieu fee program to mitigate for any impacts to wetlands. EPA would prefer to see RJCR submit a mitigation plan that includes the creation or enhancements of wetlands that replaces the functions and services of the wetlands that will be lost due to the rail line project.
- The loss of 9.3 miles of the Snow Shoe Rail trail is a significant recreational loss for the surrounding community. Please expand the discussion on plans to mitigate for this loss.

EPA appreciates the opportunity to comment this DEIS. We remain committed to addressing environmental concerns for this project as well as future projects that will be serviced by the rail line. If you should have any questions regarding these comments, please feel free to contact Ms. Jamie Davis at 570-842-1044 or by email at [davis.jamie@epa.gov](mailto:davis.jamie@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Barbara J. Rudnick', written in a cursive style.

Barbara J. Rudnick  
NEPA Team Leader  
Office of Environmental Programs

cc: US ACE Wade Chandler, State College PA  
US FWS Jen Kagel, State College PA

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